

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	Case No.10-27472JKF
Michael R. Lindsay	:	Chapter 13
Lorraine J. Lindsay	:	
Debtor(s)	:	Hearing Date:
	:	
Ronda J. Winnecour, Trustee	:	Related to Document#
	:	
Movant(s)	:	
	:	
vs.	:	
Michael R. Lindsay	:	
Lorraine J. Lindsay	:	
	:	
Respondent(s)	:	

TRUSTEE'S OBJECTION TO DEBTORS' AMENDED CLAIM OF EXEMPTIONS

Ronda J. Winnecour, Chapter 13 Trustee, represents the following:

1. The debtors filed the within proceedings under Chapter 13 on October 21, 2010.
2. Ronda J. Winnecour is the Chapter 13 Trustee in this case.
3. The Chapter 13 plan has not yet been confirmed by the Court.
4. On January 17, 2011 the debtors filed amended Schedules B and C.
5. The debtors' amended Schedule C sets forth a certain "Revocable Trust" the value of which is set forth as "unknown" and the exemption claimed in which is "0.00".
6. Given the trust is revocable, the Trustee suspects that the trust res may be available for liquidation alternative and in order for the trustee to determine the applicable liquidation alternative, she needs to know the actual monetary value of the asset.

WHEREFORE, the Trustee requests that the Court deny the debtors' claim of exemptions and direct the debtors to determine and disclose the actual monetary value of the Revocable Trust.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 02/25/11

by

/s/Mark A. Gregg  
Mark A. Gregg- PA I.D. # 30727  
Attorney for Trustee  
US Steel Tower – Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
412-471-5566

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CERTIFICATE OF SERVICE

I hereby certify that on the date shown below I served a true and correct copy of the foregoing document on the following, at the following address(es), by regular United States mail, postage prepaid:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
970 Liberty Center  
1001 Liberty Ave  
Pittsburgh PA 15222

Michael and Lorraine Lindsay  
3711 Liberty Way  
McKeesport PA 15133

Jason Mazzei, Esquire  
432 Blvd of the Allies  
Pittsburgh PA 15219

DATE: 02/25/11

Dianne DeFoor  
Office of the Chapter 13 Trustee  
U.S. Steel Tower-Suite 3250  
600 Grant Street  
Pittsburgh, Pa. 15219  
(412) 471-5566